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Attorney for: RAHMAN ABUL SHADEBADI

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAHMAN ABUL SHADEBADI,

Defendant.

No. CR-S-04-0481 GEB

STIPULATION AND ORDER

Defendant, RAHMAN ABUL SHADEBADI, through his attorney, PETER KMETO, and the United States of America, through its counsel of record, WILLIAM S. WONG, stipulate and agree to the following revised motion schedule:

1. Hearing on the motion, October 7, 2005.
2. The previously scheduled dates for hearing on motions shall be vacated.

The Defense needs additional time to investigate facts disclosed in the government's recent response to a discovery request. Accordingly, the parties stipulate that time be excluded for the pendency of this motion pursuant to 18 U.S.C. §3161(h)(1)(F) [Local Code E]– delay resulting from any pretrial motion and 18 U.S. C. §3161(h)(8)(B)(iv) [Local Code T4] – additional time to adequately prepare for pretrial proceedings.

IT IS SO STIPULATED.

Dated: _____

/s/
WILLIAM S. WONG
Assistant U.S. Attorney
for the Government

Dated: _____

/s/
PETER KMETO
Attorney for Defendant
RAHMAN ABUL SHADEBADI

ORDER

UPON GOOD CAUSE SHOWN and the stipulation of all parties, it is ordered that the hearing on motions be continued as set forth above.

The Court finds excludable time pursuant to 18 U.S.C. §3161 (h)(1)(F) [Local Code E], and 18 U.S.C. §3161 (h)(8)(B)(iv) [Local Code T4] until October 7, 2005, or whatever other date the hearing upon motions is held to permit counsel to prepare.

Dated: September 26, 2005

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge